

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re PARMALAT SECURITIES  
LITIGATION,**

**This document relates to: 07 Civ. 03790**

**JOHN HANCOCK LIFE INSURANCE  
COMPANY, JOHN HANCOCK VARIABLE  
LIFE INSURANCE COMPANY, and JOHN  
HANCOCK INSURANCE COMPANY OF  
VERMONT,**

**Plaintiffs,**

**vs.**

**BANK OF AMERICA CORPORATION,  
BANK OF AMERICA, N.A., and BANC OF  
AMERICA SECURITIES LLC,**

**Defendants.**

**MASTER DOCKET**

**04 MD 1653 (LAK)**


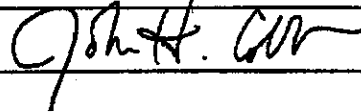
**JOINT STIPULATION AS TO  
FACT DISCOVERY PERIOD**

This Joint Stipulation applies only to the above-captioned action, which was consolidated in the *In Re Parmalat* MDL proceeding on May 17, 2007.

1. The purpose of this Stipulation is to establish a reasonable time period within which the parties may conduct fact discovery.
2. The parties request the Court's approval of a seventy-five (75) day fact discovery period commencing June 15, 2007. Within such time period, the parties shall exchange discovery requests and conduct all fact-witness depositions pursuant to the Federal Rules of Civil Procedure. This agreement does not restrict the parties from objecting to specific discovery requests.

3. Prior to the completion of the proposed 75-day fact discovery period, the parties shall consult with one another and make application to the Court, jointly or separately, to set reasonable deadlines for the exchange of expert reports, the completion of expert discovery, and the filing of dispositive motions, if any.

May 24, 2007

By 	By 
HENNIGAN BENNETT & DORMAN LLP Lauren Smith Peter J. Most 865 South Figueroa Street, Suite 2900 Los Angeles, California 90017 (213) 694-1200	HELMS MULLISS & WICKER, PLLC Peter Covington John H. Cobb 201 North Tryon Street Charlotte, North Carolina 28202 (704) 343-2196
<i>Counsel for John Hancock Life Insurance Co., John Hancock Variable Life Insurance Co., and John Hancock Insurance Co. of Vermont.</i>	<i>Counsel for Bank of America Corp., Bank of America, N.A., and Banc of America Securities LLC.</i>

\_\_\_\_\_  
Lewis A. Kaplan  
United States District Court Judge